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Debtors In Possession

**UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION**

In re:

VERITY HEALTH SYSTEM OF  
CALIFORNIA, INC., *et al.*,

Debtors and Debtors In  
Possession.

- ☒ Affects All Debtors  
☐ Affects Verity Health System of  
California, Inc.  
☐ Affects O'Connor Hospital  
☐ Affects Saint Louise Regional Hospital  
☐ Affects St. Francis Medical Center  
☐ Affects St. Vincent Medical Center  
☐ Affects Seton Medical Center  
☐ Affects O'Connor Hospital Foundation  
☐ Affects Saint Louise Regional Hospital  
Foundation  
☐ Affects St. Francis Medical Center of  
Lynwood Foundation  
☐ Affects St. Vincent Foundation  
☐ Affects St. Vincent Dialysis Center, Inc.  
☐ Affects Seton Medical Center  
Foundation  
☐ Affects Verity Business Services  
☐ Affects Verity Medical Foundation  
☐ Affects Verity Holdings, LLC  
☐ Affects De Paul Ventures, LLC  
☐ Affects De Paul Ventures - San Jose  
Dialysis, LLC

Debtors and Debtors In Possession.

Lead Case No. 2:18-bk-20151-ER

Jointly Administered With:

CASE NO.: 2:18-bk-20162-ER  
CASE NO.: 2:18-bk-20163-ER  
CASE NO.: 2:18-bk-20164-ER  
CASE NO.: 2:18-bk-20165-ER  
CASE NO.: 2:18-bk-20167-ER  
CASE NO.: 2:18-bk-20168-ER  
CASE NO.: 2:18-bk-20169-ER  
CASE NO.: 2:18-bk-20171-ER  
CASE NO.: 2:18-bk-20172-ER  
CASE NO.: 2:18-bk-20173-ER  
CASE NO.: 2:18-bk-20175-ER  
CASE NO.: 2:18-bk-20176-ER  
CASE NO.: 2:18-bk-20178-ER  
CASE NO.: 2:18-bk-20179-ER  
CASE NO.: 2:18-bk-20180-ER  
CASE NO.: 2:18-bk-20181-ER

Chapter 11 Cases

Hon. Judge Ernest M. Robles

**FOURTH STIPULATION CONTINUING HEARING  
REGARDING TRANSFER OF MEDI-CAL  
PROVIDER AGREEMENTS AND MEDICARE  
PROVIDER AGREEMENTS TO SANTA CLARA  
COUNTY [RELATED DOCKET NO. 1153]**

**Continued Hearing:**

Date: February 27, 2019  
Time: 10:00 a.m. (PST)  
Place: United States Bankruptcy Court  
Courtroom 1568  
255 East Temple Street  
Los Angeles, California 90012



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1 This Stipulation is entered between Verity Health System Of California, Inc. (“VHS”) and  
2 the above-referenced affiliated debtors, the debtors and debtors in possession in the above-captioned  
3 chapter 11 bankruptcy cases (collectively, the “Debtors”), the California Department of Health Care  
4 Services (“DHCS”) and U.S. Department of Health and Human Services (“HHS”), with respect to  
5 the following:  
6

7 1. On December 27, 2018, the Court entered an *Order (A) Authorizing the Sale of*  
8 *Certain of the Debtors’ Assets to Santa Clara County Free and Clear of Liens, Claims and*  
9 *Encumbrances, and Other Interests; (B) Approving the Assumption and Assignment of an Unexpired*  
10 *Lease Related Thereto; and (C) Granting Related Relief* [Dkt. No. 1153] (the “Sale Order”).

11 2. The Sale Order provides that the Court will hold a hearing on January 30, 2019, at  
12 10:00 a.m. (Pacific Time) (the “Hearing Date”) to consider the issues raised by DHCS and HHS  
13 regarding the transfer and/or proposed assumption and assignment or rejection of the Medi-Cal  
14 Provider Agreements and Medicare Provider Agreements to Santa Clara County (“SCC”). Sale  
15 Order, ¶¶ 31-32.  
16

17 3. On January 25, 2019, the Court entered an *Order Approving Stipulation Continuing*  
18 *Hearing Regarding Transfer of Medi-Cal Provider Agreements and Medicare Provider Agreements*  
19 *to Santa Clara County* [Dkt. No. 1371], continuing the Hearing Date to February 6, 2019.  
20

21 4. On February 5, 2019, the Court entered an *Order Approving Second Stipulation*  
22 *Continuing Hearing Regarding Transfer of Medi-Cal Provider Agreements and Medicare Provider*  
23 *Agreements to Santa Clara County* [Dkt. No. 1466], further continuing the Hearing Date to February  
24 13, 2019 (the “Continued Hearing Date”).

25 5. On February 11, 2019, the Court entered an *Order Approving Third Stipulation*  
26 *Continuing Hearing Regarding Transfer of Medi-Cal Provider Agreements and Medicare Provider*  
27  
28

1 *Agreements to Santa Clara County* [Dkt. No. 1526], further continuing the Hearing Date to February  
2 20, 2019 (the “Continued Hearing Date”).

3 6. The Debtors, DHCS and HHS have agreed to further continue the Continued Hearing  
4 Date. The parties are currently negotiating issues concerning the transfer of the Medi-Cal Provider  
5 Agreements and Medicare Provider Agreements to SCC and need additional time to reach a  
6 consensual resolution.  
7

8 7. The Debtors, DHCS and HHS have also agreed to continue the deadline for DHCS  
9 and HHS to file a supplemental objection to the proposed transfer of the Medi-Cal Provider  
10 Agreements and Medicare Provider Agreements (the “Supplemental Objection Deadline”).

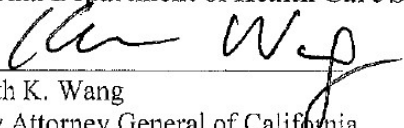
11 NOW, THEREFORE, all of the parties to this Stipulation hereby stipulate as follows:

12 A. The Continued Hearing Date shall be continued from February 20, 2019, at 10:00  
13 a.m. to February 27, 2019, at 10:00 a.m. (Pacific Time).  
14

15 B. The Supplemental Objection Deadline shall be continued to February 22, 2019, at  
16 12:00 p.m. (Pacific Time). The Debtors’ deadline to file a reply to any supplemental objection shall  
17 be February 25, 2019, at 12:00 p.m. (Pacific Time).  
18

19 **Verity Health System of California, Inc., et al.**

20 By: /s/ Tania M. Moyron  
21 Samuel R. Maizel  
22 Tania M. Moyron  
23 Dentons US LLP  
Counsel to Debtors and Debtors In Possession

24 **California Department of Health Care Services**  
25 By:   
26 Kenneth K. Wang  
27 Deputy Attorney General of California  
Counsel to Creditor Department of Health Care Services  
28

**United States Department of Health and Human Services  
and Centers for Medicare and Medicaid Services**

By: Seth Brandon Shapiro  
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